



**Dale Haines**  
Operations Manager

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Anchorage, Alaska 99503  
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August 18, 2010

Mr. Chae Park  
U.S. Environmental Protection Agency  
Region 10, Water Compliance Section  
1200 Sixth Avenue, OW-133  
Seattle, WA 98101

**RECEIVED**

AUG 19 2010

DEC  
Division of Water Quality  
Wastewater Discharge Program

RETURN RECEIPT REQUESTED  
CERTIFIED MAIL 91 7108 2133 3937 7382 8081

Re: NPDES Permit No. AKG-31-5002  
Trading Bay Production Facility July 2010 Discharge Monitoring Reports (DMR)

Dear Mr. Park:

Union Oil Company of California operates the Trading Bay Production Facility that discharges regulated effluents in Cook Inlet, Alaska under NPDES Permit No. AKG-31-5002. Pursuant to condition VI.B of the Permit, Union Oil Company of California is hereby submitting the July 2010 NPDES Discharge Monitoring Reports (DMRs) for the Trading Bay Production Facility.

The format of the attached July DMRs is essentially the same as the format of the DMRs we submitted in June, except for the items that your Data Steward has agreed to exclude on his July 16 email. The pages eliminated were all discharge forms for Granite Point Tank Farm and Trading Bay Production Facility that are not required by the permit and all the non-aqueous based drilling fluids (NAF) forms for all 12 facilities. We are using the forms provided by EPA for all other discharge reporting. These forms still contain a number of errors that have not been resolved. Consequently, we have revised the forms to accommodate the reporting that is required by the permit. Your Data Steward in the compliance and enforcement department is aware of the errors, and our revisions to accommodate the errors. We are awaiting further guidance from them on EPA's preferred path forward and the preferred forms for future DMRs to be submitted by Union.

Using the new forms, the DMRs for our 12 facilities still contain nearly 250 pages. Signing each page to certify the DMRs is a substantial administrative burden. Ms. Hahn Shaw telephonically approved Union submitting this letter as certification of all the attached DMRs, in place of endorsing each of the attached DMRs. Thus, the certification below applies to all of the DMRs attached to this letter.

Mr. Chae Park  
US Environmental Protection Agency  
August 18, 2010  
Page 2

If you have any questions, please direct them to Ms. Marilu Moreno-Jones at 907-263-7305 or via e-mail at [mmjones@chevron.com](mailto:mmjones@chevron.com).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Best regards,

A handwritten signature in cursive script that reads "Dale Haines". The signature is written in dark ink and is positioned above the printed name.

Dale Haines

cc: ADEC / Certified Mail 91 7108 2133 3937 7382 8098

## NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

## DISCHARGE MONITORING REPORT (DMR)

Form Approved

OMB No. 2040-0004

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME: UNION OIL COMPANY OF CALIFORNIA (UNOCAL)

ADDRESS: P.O. BOX 196247  
ANCHORAGE, AK 99519-6247

FACILITY: TRADING BAY TREATMENT FACILITY

LOCATION: COOK INLET, Alaska

ATTN: JOHN ZAGER, GENERAL MANAGER

AKG315002

PERMIT NUMBER

015-A

DISCHARGE NUMBER

## MONITORING PERIOD

MM/DD/YYYY

07/01/2010

MM/DD/YYYY

07/31/2010

FROM

TO

DMR Mailing ZIP CODE: 99519

MINOR

(SUBR 02)

PRODUCED WATER AND SAND

External Outfall

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Nitrogen, ammonia total (as N) 00610 1 0 Effluent Gross	SAMPLE MEASUREMENT	*****	*****	*****	*****	7	7	mg/L	0	Quarterly	GRAB
	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Quarterly	GRAB
Silver total recoverable 01079 1 0 Effluent Gross	SAMPLE MEASUREMENT	*****	*****	*****	*****	5	5	ug/L	0	Monthly	GRAB
	PERMIT REQUIREMENT	*****	*****	*****	*****	23 MO AVG	47 DAILY MX	ug/L		Monthly	GRAB
Silver total recoverable 01079 P 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	23 MO AVG	47 DAILY MX	ug/L		Quarterly	CALCTD
Silver total recoverable 01079 Q 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	23 MO AVG	47 DAILY MX	ug/L		Weekly	GRAB
Zinc, total recoverable 01094 1 0 Effluent Gross	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.03	0.03	mg/L	0	Monthly	GRAB
	PERMIT REQUIREMENT	*****	*****	*****	*****	0.9 MO AVG	1.9 DAILY MX	mg/L		Monthly	GRAB
Zinc, total recoverable 01094 P 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	0.9 MO AVG	1.9 DAILY MX	mg/L		Monthly	GRAB
Zinc, total recoverable 01094 Q 0 See Comments	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
	PERMIT REQUIREMENT	*****	*****	*****	*****	0.9 MO AVG	1.9 DAILY MX	mg/L		Quarterly	GRAB

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE		DATE
John Zager, General Manager		(907) 276-7600		08/18/2010
Mid Continent/Alaska Business Unit		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		AREA Code
TYPED OR PRINTED		NUMBER	MM/DD/YYYY	

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

P=MONT. REDUCE (II.G.6.a.1.)

Q=MONT INCREASE (II.G.6.a.2.)

R=ACCELERATED TESTING (III.A.7)

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 ADDRESS: P.O. BOX 196247  
 ANCHORAGE, AK 99519-6247  
 FACILITY: TRADING BAY TREATMENT FACILITY  
 LOCATION: COOK INLET, Alaska  
 ATTN: JOHN ZAGER, GENERAL MANAGER

AKG315002	015-A
PERMIT NUMBER	DISCHARGE NUMBER

DMR Mailing ZIP CODE: 99519  
 MINOR  
 (SUBR 02)  
 PRODUCED WATER AND SAND  
 External Outfall

MONITORING PERIOD			
MM/DD/YYYY		MM/DD/YYYY	
FROM	07/01/2010	TO	07/31/2010

No Discharge ☐

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Copper, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	6	6	ug/L	0	Monthly	GRAB
01119 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	*****	*****	*****	47 MO AVG	117 DAILY MX	ug/L		Monthly	GRAB
Copper, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
01119 P 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	47 MO AVG	117 DAILY MX	ug/L		Quarterly	GRAB
Copper, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
01119 Q 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	47 MO AVG	117 DAILY MX	ug/L		Weekly	GRAB
Manganese, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	2	2	mg/L	0	Monthly	GRAB
11123 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	*****	*****	*****	25 MO AVG	50 DAILY MX	mg/L		Monthly	GRAB
Manganese, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
11123 P 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	25 MO AVG	50 DAILY MX	mg/L		Quarterly	GRAB
Manganese, total recoverable	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
11123 Q 0 See Comments	PERMIT REQUIREMENT	*****	*****	*****	*****	25 MO AVG	50 DAILY MX	mg/L		Weekly	GRAB
Hydrocarbons, aromatic	SAMPLE MEASUREMENT	*****	*****	*****	*****	9	9	mg/L	0	Monthly	GRAB
39942 1 0 Effluent Gross	PERMIT REQUIREMENT	*****	*****	*****	*****	18 MO AVG	27 DAILY MX	mg/L		Monthly	GRAB

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER  John Zager, General Manager Mid Continent/Alaska Business Unit TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE		DATE
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MM/DD/YYYY

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07/01/2010

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		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Hydrocarbons, aromatic	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
39942 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	18 MO AVG	27 DAILY MX	mg/L		Quarterly	GRAB
See Comments											
Hydrocarbons, aromatic	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
39942 Q 0	PERMIT REQUIREMENT	*****	*****	*****	*****	18 MO AVG	27 DAILY MX	mg/L		Weekly	GRAB
See Comments											
Hydrocarbons, aqueous	SAMPLE MEASUREMENT	*****	*****	*****	*****	10	10	mg/L	0	Monthly	GRAB
50259 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Monthly	GRAB
Effluent Gross											
Hydrocarbons, aqueous	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
50259 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Quarterly	GRAB
Effluent Gross											
Hydrocarbons, aqueous	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
50259 Q 0	PERMIT REQUIREMENT	*****	*****	*****	*****	Req. Mon. MO AVG	Req. Mon. DAILY MX	mg/L		Weekly	GRAB
Effluent Gross											
Mercury, total (as Hq)	SAMPLE MEASUREMENT	*****	*****	*****	*****	0.2	0.2	mg/L	0	Monthly	GRAB
71900 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	0.6 MO AVG	1.0 DAILY MX	ug/L		Monthly	GRAB
Effluent Gross											
Mercury, total (as Hg)	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
71900 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	0.6 MO AVG	1.0 DAILY MX	ug/L		Quarterly	GRAB
See Comments											

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER John Zager, General Manager Mid Continent/Alaska Business Unit TYPED OR PRINTED	I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	TELEPHONE		DATE
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		VALUE	VALUE	UNITS	VALUE	VALUE	VALUE	UNITS			
Mercury, total (as Hg)	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
71900 Q 0	PERMIT REQUIREMENT	*****	*****	*****	*****	0.6 MO AVG	1.0 DAILY MX	ug/L		Weekly	GRAB
See Comments											
Toxicity, Chronic	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
TT000 1 0	PERMIT REQUIREMENT	*****	*****	*****	*****	283 MO AVG	568 DAILY MX	toxic		Weekly	GRAB
Effluent Gross											
Toxicity, Chronic	SAMPLE MEASUREMENT	*****	*****	*****	*****	No Sample	No Sample	toxic	NA	Quarterly	GRAB
TT000 P 0	PERMIT REQUIREMENT	*****	*****	*****	*****	283 MO AVG	568 DAILY MX	toxic		Quarterly	GRAB
Effluent Gross											
Toxicity, Chronic	SAMPLE MEASUREMENT	*****	*****	*****	*****	NA	NA	NA	NA	NA	NA
TT000 R 0	PERMIT REQUIREMENT	*****	*****	*****	*****	283 MO AVG	568 DAILY MX	toxic		See Permit	GRAB
Effluent Gross											

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